THE LAW OFFICES OF

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June 15, 2018

Hon. Sarah Netburn United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, N.Y. 10007

Re: <u>United States v. Sharma, et. al, 18-cr-340 (LGS)</u>, *Bond Modification*

Dear Judge Netburn,

I am making this application, as a follow-up to my June 13, 2018, letter-motion to the District Court, given the Court's familiarity with this matter and that Judge Schofield is presently at a Judicial Conference.

Due to financial constraints, Defendant Raymond Trapani respectfully requests modification of the conditions of his pre-trial release to allow him to secure his \$2.5 million dollar bond with a total of only one hundred thousand dollars (\$100,000.00) in cash and approximately thirty-thousand dollars (\$30,000.00) in equity in a home owned by family friend Basil Gaissert, located in Virginia Beach, VA (where Mr. Trapani is currently residing under home confinement), rather than the seven-hundred-fifty thousand dollars (\$750,000.00) currently required.

Mr. Trapani is currently engaged in an intensive probation program, and has enrolled in Tidewater Community College for the Summer Semester, where he is studying College Composition and Mythology Literature & Arts.

Mr. Trapani also requests that the time to satisfy this condition be extended from June 13 to June 19, 2018.

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I have communicated with AUSA Samson Enzer, and the Government does not oppose the requested modifications.

Thank you for consideration of this application.

Respectfully submitted,

____/S/___ Joseph A. Bondy

Counsel to Raymond Trapani

c: AUSA Samson Enzer